10001 Park Run Drive

## 1 **Marquis Aurbach Coffing** Nick D. Crosby, Esq. 2 Nevada Bar No. 8996 Jackie V. Nichols, Esq. Nevada Bar No. 14246 10001 Park Run Drive Las Vegas, Nevada 89145 Telephone: (702) 382-0711 Facsimile: (702) 382-5816 ncrosby@maclaw.com 6 inichols@maclaw.com Attorneys for Defendant Las Vegas Metropolitan Police Department 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 DAVID LAVELLE, Case Number: 10 2:19-cv-01251-JCM-DJA Plaintiff, 11 STIPULATION AND ORDER TO VS. 12 EXTEND DEFENDANT LAS VEGAS Las Vegas, Nevada 89145 382-0711 FAX: (702) 382-5816 CITY OF LAS VEGAS NEVADA; LAS METROPOLITAN POLICE 13 VEGAS METROPOLITAN POLICE DEPARTMENT; and ROBERT BROWN, PLAINTIFF'S MOTION FOR 14 Police Officer with Las Vegas Metropolitan SUMMARY JUDGMENT Police Department in his official and 15 individual capacities, (FIRST REQUEST) 16 Defendants. (702) 17 The parties, by and through their undersigned counsel of record, and hereby agree 18 and jointly stipulate that Defendant Las Vegas Metropolitan Police Department's Response 19 to Plaintiff's Motion for Summary Judgment [ECF No. 59], currently due on November 17, 20 2020, be extended to and including Wednesday, November 25, 2020. 21 . . . 22 23 24 25 26 27

1	Counsel for Defendant Las Vegas Metropolitan Police Department was ill last week
2	and has had several competing deadlines and hearings in the past weeks and the parties have
3	agreed to an 8-day extension for Defendant Las Vegas Metropolitan Police Department's
4	response deadline. This request for extension is made in good faith and necessary to provide
5	additional time for preparation of the response and not for the purposes of delay.
6	WHEREFORE, the parties respectfully request that the Response be extended to and
7	including Wednesday, November 25, 2020.
8	DATED this <u>17th</u> day of November, 2020 DATED this <u>17th</u> day of November, 2020
9	MARQUIS AURBACH COFFING
10	By: /s/ Nathan W. Kellum  By: /s/ Jackie V. Nichols
11	Nathan W. Kellum, Esq. Nick D. Crosby, Esq. (pro hace vice) Nevada Bar No. 8996
12	TN BAR #13482; MS BAR # 8813 Jackie V. Nichols, Esq. Center for Religious Expression Nevada Bar No. 14246
13	699 Oakleaf Office Lane, Suite 107 10001 Park Run Drive
	Memphis, TN 38117 Las Vegas, Nevada 89145  David L Marrill Egg. Attorneys for Defendant Las Vegas
14	Nevada Bar No. 6060  Metropolitan Police Department
15	David J. Merrill, PC 10161 Park Run Drive, Suite 150
16	Las Vegas, Nevada 89145 Local Counsel
17	Attorneys for Plaintiff David LaVelle
18	
19	<u>ORDER</u>
20	The above Stipulation is hereby GRANTED.
21	IT IS SO ORDERED December 11, 2020.
22	
23	Xellus C. Mahan
24	UNITED STATES DISTRICT COURT JUDGE
25	
26	
27	

## 0001 Park Run Drive

Las Vegas, Nevada 89145 382-0711 FAX: (702) 382-5816

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<b>CERTIFICATE OF SERVIC</b>	E
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I hereby certify that I electronically filed the foregoing STIPULATION AND ORDER TO EXTEND DEFENDANT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY **JUDGMENT** 

(FIRST REQUEST) with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the <u>17th</u> day of November, 20209.

 $\boxtimes$ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch An employee of Marquis Aurbach Coffing